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CHESS FEDERATION, INC. and RANDALL D. HOUGH

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

**UNITED STATES OF AMERICA
CHESS FEDERATION, INC., *et al*,**

Plaintiffs,

v.

SUSAN POLGAR, *et al*,

Defendants.

Case No. 3:08-CV-05126-MHP

**DECLARATION OF BILL HALL IN
SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT
POLGAR'S MOTION TO COMPEL**

DATE: September 14, 2009

TIME: 2:00 p.m.

CTRM: 15, 18th Floor

JUDGE: The Hon. Marilyn H. Patel

SUSAN POLGAR,

Counter-Plaintiff,

v.

**BILL GOICHBERG, BILL HALL, RANDY
BAUER, JIM BERRY, KARL
KRONENBERGER,**

Third Party Defendants,

v.

RANDALL HOUGH,

Counter-Defendant.

1 I, Bill Hall, declare as follows:

2 1. I serve as the Executive Director of the United States of America Chess
3 Federation, Inc. ("USCF"), a party to this action. I also serve as the corporate secretary
4 for the USCF. Unless otherwise stated, I have personal knowledge of the facts stated
5 herein.

6 2. At the time USCF counsel received printouts from a blog entitled,
7 <http://uscf-said.blogspot.com> ("Blog"), all content had been deleted from the Blog, and,
8 to date, the USCF is aware of no persons other than Polgar and her counsel who have
9 seen the contents of the Blog live on the Internet.

10 3. The USCF has presented evidence, which Polgar has not disputed, that
11 Polgar had in her possession some of the stolen emails in January and June 2008,
12 months before the Blog was even created.

13 4. Polgar emailed the USCF Executive Board in June 2008, before the
14 creation of the Blog, quoting from stolen emails.

15 5. Upon Polgar first disclosing snippets of USCF confidential emails in
16 December 2007 and January 2008, the USCF asked Polgar where she obtained the
17 emails. Polgar would not respond with specificity, instead stating that she had obtained
18 them from a newsgroup on the Internet. The USCF conducted a search of these
19 newsgroups for these emails, but could not locate any evidence of the stolen emails
20 within Internet newsgroups at that time.

21 6. When the Mottershead Report was disclosed in the fall of 2007, Polgar
22 immediately started making threats to sue the USCF and other USCF-related parties.
23 She repeated these threats many times verbally and in email exchanges. The USCF
24 hired counsel to, among other things, assess the threats by Polgar and perform a risk
25 analysis for the USCF regarding Polgar's threats.

26 7. Third parties sued by Polgar in the Texas litigation have all needed to
27 coordinate with USCF counsel. Specifically, because Polgar did not specify in her
28 Texas complaint how the supposedly wrongful acts were attributed to the defendants,

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1 the defendants have coordinated on their defense. Further, Polgar has sent nearly
2 identical discovery requests to all the parties in Texas, and the Texas defendants have
3 coordinated in responding to discovery.

4 I declare under penalty of perjury under the laws of the United States of America
5 that the foregoing is true and correct and that this Declaration was executed on August
6 31, 2009, in Crossville, Tennessee.

7 s/Bill Hall
8 Bill Hall
9 Secretary of the USCF
10

11 **ATTESTATION OF CONCURRENCE IN FILING**

12 Pursuant to the General Order No. 45, section 45 X(B), for The United States
13 District Court for the Northern District of California, I, Karl S. Kronenberger, hereby attest
14 that the concurrence to the filing of this DECLARATION OF BILL HALL IN SUPPORT
15 OF PLAINTIFFS' OPPOSITION TO DEFENDANT POLGAR'S MOTION TO COMPEL
16 has been obtained from Bill Hall who has provided the conformed signature above.
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